

**Category #48:**

The Guidelines should contain other cleaning technology considered to be equally beneficial and effective as their chemical counterparts.

**State Response:**

OGS will consider an examination of other cleaning technologies considered to be equally beneficial and effective as their chemical counterparts in the future.

**Frequently Asked Public Comment:**

Review Other Technologies Considered to be Equally Environmentally Beneficial and Effective as their Chemical Counterparts

--I am commenting on behalf of the biological based cleaning products industry. As the criteria that has been proposed are based solely on the Green seal standards, there are limitations in this that greatly inhibit our industry. (1) Green seal has focused on review of chemical component criteria to ensure certain parameters are met. For example in GS-37, there are no criteria in place to review a biological component. (2) It has to be noted that if NY is proposing a greening of the cleaning products used in its hospitals, schools etc, then it should not be limited what is probably the most natural, safest ingredient - a bacterial strain. These components are far less toxic and hazardous than their chemical counterparts and are equally effective in cleaning or reducing odors etc. (3) The efficacy and performance parameters set in place have been set up again for the chemical components and overlooked the slower more effective role of bacteria. (4) We as an industry are trying to educate groups like Green Seal to expand their component criteria to incorporate non pathogenic naturally occurring bacterial strains. (5) I would like to propose some additional verbiage that would also allow procurement committees to review other technologies considered to be equally environmentally beneficial and effective as their chemical counterparts. (Anne Turnbough Ph.D., Regulatory Affairs Manager, Novozymes Biologicals Inc.)

--A few of the other improvements that I will be recommending include a category to replace traditional drain openers with bacteriological products as well as using bacteriological carpet spotters, grease digesters and more -- as if you haven't guessed it, I'm a big fan of using nonpathogenic (not harmful to living organisms) bacteria for cleaning as the mimic how nature does things a concept called biomimicry. (Professor Stephen Ashkin. President of The Ashkin Group, LLC.)